

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRIGHT HAND LLC,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, and
UNINCORPORATED ASSOCIATES
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No.: 1:24-cv-07564

Judge Jeremy C. Daniel

Magistrate Judge Young B. Kim

JURY TRIAL DEMAND

PRELIMINARY INJUNCTION ORDER

This cause coming before the Court on Plaintiff Shenzhen Jisu Technology Co., Ltd. (“Plaintiff”) Motion for Entry of a Preliminary Injunction against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A attached hereto (collectively, “Defendants”) and the online marketplace accounts identified in Schedule A (the “Online Marketplaces”), and the Court having reviewed the Motion and the accompanying record and evidence presented at a hearing, GRANTS Plaintiff’s Motion in its entirety and states as follows.

This Court finds Plaintiff has provided notice to Defendants in accordance with the Temporary Restraining Order entered October 3, 2024, [29] (“TRO”), and Federal Rule of Civil Procedure 65(a)(1).

This Court also finds that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically,

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces.

Plaintiff has provided a basis to conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars and/or funds from U.S. bank accounts, and have sold products which infringe Plaintiff's federally registered patent, U.S. Patent No. 8,523,377 B1 (collectively, "Plaintiff's Patent") to residents of Illinois. A list of the Plaintiff's Patent is included in the below chart.

Asserted Patent	Exclusive Licensee (Full and Sole Control over Enforcement)
U.S. Patent No. 8,523,377 B1	Bright Hand LLC

In this case, Plaintiff has presented screenshot evidence that each Defendant e-commerce store is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which Illinois residents can and do purchase products which infringe Plaintiff's Patents. *See* Docket Nos. [6]-[11], which includes screenshot evidence confirming that each Defendant e-commerce store does stand ready, willing, and able to ship its counterfeit goods which infringe Plaintiff's Patents to customers in Illinois.

This Court also finds that the injunctive relief previously granted in the TRO should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's previously granted Motion for Entry of a TRO establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiff has proved a *prima facie* case of: (A) patent infringement because (1) Plaintiff's Patent is a valid patent registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use, manufacture, or sell any product embodying Plaintiff's Patent, and (3) Defendants' use, manufacture, and/or sale of

Plaintiff's Patent infringes upon Plaintiff's rights in Plaintiff's Patent; and (B) unfair competition under the Lanham Act because Plaintiff has demonstrated that it has a protectable patent rights and Defendants' infringement of Plaintiff's Patent, while evading traditional enforcement mechanisms and harming Plaintiff's market share constitutes an unfair method of competition under the Lanham Act. Furthermore, Defendants' continued and unauthorized use of Plaintiff Patent irreparably harms Plaintiff through loss of patent exclusivity, market share, and loss of current and future sales. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. Accordingly, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be preliminarily enjoined and restrained from:
 - a. making, using, importing, offering for sale, or selling products that infringe upon Plaintiff's Patent, including the products described in the Verified Complaint and its accompanying exhibits and those available at or under the accused product URLs, ASINs, and/or Product IDs listed in Schedule A to the Verified Complaint and attached hereto, including any other products which embody any of the claims of Plaintiff's Patent, in any matter;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiff product or any other product produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale that is protected under Plaintiff's Patent;

- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff; and
 - d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which embody any of the Claims of Plaintiff's Patent.
- 2. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.
- 3. Upon Plaintiff's request, Defendants and any third party with actual notice of this Order who is providing services for any of Defendants, or in connection with any of Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as Amazon.com, Inc. ("Amazon"), PayPal, Inc. ("PayPal"), and Payoneer Global, Inc. ("Payoneer") (collectively, the "Third-Party Providers"), shall, within seven (7) calendar days after receipt of such notice, provide to Plaintiff expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:
 - a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying

information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and


- c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, Amazon, PayPal, Payoneer, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
4. Upon Plaintiff's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 3, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of infringing goods which embody any of the claims of Plaintiff's Patent.
5. Any Third-Party Providers, including Amazon, PayPal, and Payoneer, shall, within seven (7) calendar days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants' seller aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibit 2 to the Verified Complaint [6]-[11], and any e-mail addresses provided for Defendants by third parties; and

- b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further order by this Court.
6. Plaintiff may provide notice of the proceedings in this case to Defendants, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by sending an e-mail with the Pleadings, this Order, and other relevant documents to the e-mail addresses identified in Exhibit 2 to the Verified Complaint [6]-[11] and any e-mail addresses provided for Defendants by third parties. The Clerk of the Court is directed to issue a single original summons in the name of "The Individuals and all other Defendants identified in the Complaint" that shall apply to all Defendants. The combination of providing notice via e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.
7. Plaintiff's unredacted Verified Complaint [5], Schedule A to the Verified Complaint [5-1], Exhibits 1 to the Verified Complaint [5-2], Exhibit 2 to the Verified Complaint [6]-[11], Exhibit 6 to the Verified Complaint [5-4], Plaintiff's Notice of Claims [5-5], Exhibit A to Plaintiff's Memorandum in Support of its Motion for Entry of a Temporary Restraining Order [25], and the TRO [29] are to remain under seal until Plaintiff's *Ex Parte* Motion for Entry of a Temporary Restraining Order [39] is resolved and resulting TRO has expired or been converted into a preliminary injunction.
8. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure

and the Northern District of Illinois Local Rules. Any third party impacted by this Order may move for appropriate relief.

9. The \$10,000.00 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

ENTERED:

A handwritten signature in black ink, appearing to read 'J. Daniel', is written over a horizontal line.

Jeremy C. Daniel
United States District Judge

Dated: October 31, 2024

Schedule A

#	Seller Alias	Merchant ID	Product ID	Product Link
1	huuzee	A1T8UQI7K951BI	B09ZL9YRYQ	https://www.amazon.com/dp/B09ZL9YRYQ?psc=1
			B0C4YCR42L	https://www.amazon.com/dp/B0C4YCR42L?psc=1
2	OMITTED	OMITTED	OMITTED	OMITTED
3	huida-us	A8A6IM1UGR3SF	B099KBNSPG	https://www.amazon.com/dp/B099KBNSPG?psc=1
4	wewoo	A26VADVVP6E64N	B08SKZ7WDP	https://www.amazon.com/dp/B08SKZ7WDP?psc=1
5	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
6	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED
7	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
8	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
9	OMITTED	OMITTED	OMITTED	OMITTED
10	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
11	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
12	Fiada US	A2Z8AANX9XQJFL	B0862HDJZK	https://www.amazon.com/dp/B0862HDJZK?psc=1
13	G LED LOVES	A30I1XPZNJ2P0O	B0BS15NG1Q	https://www.amazon.com/dp/B0BS15NG1Q?psc=1
14	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
15	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED
16	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
17	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
18	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
19	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED
20	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED
21	KOOPOL US	A13BW2ZX9SWD6O	B0CCRMGP21	https://www.amazon.com/dp/B0CCRMGP21?psc=1
22	worzit	AQBYGE26BLAT7	B09GBK385G	https://www.amazon.com/dp/B09GBK385G?psc=1
23	caimeimei-us	A1OUHQ7AX5ZRIC	B09DYGXJ3W	https://www.amazon.com/dp/B09DYGXJ3W?psc=1
24	Vxcigen	A2LNVB3TIWAJLJ	B09C5FHQMD	https://www.amazon.com/dp/B09C5FHQMD?psc=1
25	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
26	HUAMAI MALL	AQ15LQ0IL7KMR	B0CH2TGV6X	https://www.amazon.com/dp/B0CH2TGV6X?psc=1

#	Seller Alias	Merchant ID	Product ID	Product Link
			B09ZRRY86X	https://www.amazon.com/dp/B09ZRRY86X?psc=1
			B0B153K3WR	https://www.amazon.com/dp/B0B153K3WR?psc=1
27	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED
28	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
29	OMITTED	OMITTED	OMITTED	OMITTED
30	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
31	Mucco Store	A37TSZPAVTDZCC	B09Z81RR5W	https://www.amazon.com/dp/B09Z81RR5W?psc=1
32	GoodOd Tech	A1IVF77KZA17OW	B083NRCK9N	https://www.amazon.com/dp/B083NRCK9N?psc=1
			B08D6NZH6L	https://www.amazon.com/dp/B08D6NZH6L?psc=1
33	DACHU SHOP	A2OE273EHOXUW	B0CH11H5FF	https://www.amazon.com/dp/B0CH11H5FF?psc=1
			B0CCRP9SKN	https://www.amazon.com/dp/B0CCRP9SKN?psc=1
			B0CHF4RTV8	https://www.amazon.com/dp/B0CHF4RTV8?psc=1
34	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
35	HERUI US	A1X91D34QOU697	B0CDV77CRD	https://www.amazon.com/dp/B0CDV77CRD?psc=1
36	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
37	Fpxnb	A2SUSH9O749CZT	B0B77GK27B	https://www.amazon.com/dp/B0B77GK27B?psc=1
38	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED
39	OMITTED	OMITTED	OMITTED	OMITTED
40	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
41	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
42	EXCEPTED	EXCEPTED	EXCEPTED	EXCEPTED
			EXCEPTED	EXCEPTED